## UNITED STATES DISTRICT COURT **DISTRICT OF MAINE**

UNITED STATES OF AMERICA

No. 2:25-mj-00179-KFW

v.

ALICE V. JONES

**COMPLAINT** 

The undersigned complainant, being duly sworn, states:

## **COUNT ONE** (Threatening Interstate Communication)

On about May 11, 2025, in the District of Maine and elsewhere, the defendant,

#### **ALICE V. JONES**

did knowingly, willfully, and recklessly transmit in interstate commerce a communication containing a threat to injure the person of another. Specifically, the Defendant placed a telephone call to Victim 1, during which Defendant stated "You are a fucking nazi. You will die because you are a fucking nazi."

All in violation of Title 18, United States Code, Section 875(c).

# **COUNT TWO** (Anonymous Telecommunications Harassment)

On about May 11, 2025, in the District of Maine and elsewhere, the defendant,

#### **ALICE V. JONES**

made a telephone call and utilized a telecommunications device, without disclosing her identity, with intent to annoy, abuse, threaten, and harass Victim 1, who received the communication.

All in violation of Title 47, United States Code, Section 223(a)(1)(C).

# **COUNT THREE** (Threatening Interstate Communication)

On about May 11, 2025, in the District of Maine and elsewhere, the defendant,

## ALICE V. JONES

did knowingly, willfully, and recklessly transmit in interstate commerce a communication containing a threat to injure the person of another. Specifically, in series of telephone call to Victim 2, Defendant told Victim 2 that he was the reason the Second Amendment existed and that she was coming for him; that Victim 2 was a nazi and that Americans murder nazis, that if Victim 2 kept fucking with citizens Victim 2 would die, and that this is what the Second Amendment is for.

All in violation of Title 18, United States Code, Section 875(c).

## **COUNT FOUR** (Anonymous Telecommunications Harassment)

On about May 11, 2025, in the District of Maine and elsewhere, the defendant,

### **ALICE V. JONES**

made a telephone call and utilized a telecommunications device, without disclosing her identity, with intent to annoy, abuse, threaten, and harass Victim 2, who received the communication.

All in violation of Title 47, United States Code, Section 223(a)(1)(C).

The complainant states that this complaint is based on the attached affidavit, which is incorporated by reference.

> Andrew Allaire, Special Agent Federal Bureau of Investigation

Sworn to telephonically and signed electronically in accordance with the requirements of Rule 4.1 of the Federal Rules of Criminal Procedures

Date: May 15 2025

City and state: Portland, Maine

Karen Frink Wolf, U.S. Magistrate Judge